

## Jamie Belcourt (adpce.ad)

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**From:** Jamie Belcourt (adpce.ad)  
**Sent:** Wednesday, November 16, 2022 12:51 PM  
**To:** bryanh@sbht.com  
**Cc:** Stacie Wassell (adpce.ad); Richard Healey (adpce.ad)  
**Subject:** PJ's Tank Wash (ARP001053, AFIN: 02-00086) Semiannual Report for April 1, 2022 – September 31, 2022

Mr. Hudson,

Thank you for your semiannual pretreatment report submission for PJ's Tank Wash (ARP001053, AFIN: 02-00086) for the April 1, 2022 – September 31, 2022 reporting period. This report was received, reviewed, and deemed complete with the reporting requirements in 40 CFR 403.12(e).

In regards to the analytical report provided, it was noted that the contracted laboratory (Gulf States Environmental Laboratories) subcontracted the copper and mercury analysis to NELAP Laboratory #02006. After viewing TNI's online searchable database, this laboratory was identified as Tremonton Waste Water Treatment Plant Laboratory located in Tremonton, Utah. This laboratory is not accredited in the State of Arkansas. A.C.A. 8-2-201, referred to as the State Environmental Laboratory Accreditation Program Act, states that information submitted to DEQ by permittees is required to come from laboratories that DEQ has certified. A listing of DEQ-certified laboratories can be found at [https://www.adeg.state.ar.us/techsvs/lab\\_cert/labcert.aspx](https://www.adeg.state.ar.us/techsvs/lab_cert/labcert.aspx).

Further, it was also noted that samples were collected on October 4, 2022. This date is outside of the semiannual reporting period. In addition, the samples were received in the laboratory for analysis on October 5, 2022. However, the samples were analyzed on October 10, October 11, and October 14, 2022. This is a period of six (6), seven (7), and ten (10) days following sample collection. Furthermore, samples were noted to be preserved on ice, but arrived at the laboratory at a temperature of 18.2°C (64.7°F).

In the future, please ensure that samples that are collected for semiannual reporting are collected within the reporting period, a DEQ-certified laboratory is used to conduct your analyses and samples are both cooled (maintained  $\leq 6^{\circ}\text{C}$ ) and analyzed as soon as possible. Samples may be shipped overnight, or an alternative shipping/carrier method may be chosen to minimize holding times.

Future instances of noncompliance with A.C.A. 8-2-201 or the procedures set forth in 40 CFR Part 136 may result in enforcement action.

Please reply to this email to let me know that you have received it.

If you have any questions or concerns, or if I can be of any assistance, please do not hesitate to reach out.

Thank you,

**Jamie Belcourt** | State Pretreatment Coordinator  
**Division of Environmental Quality** | **Office of Water Quality**  
**Policy and Administration**

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**ARKANSAS**  
ENERGY & ENVIRONMENT

# SEMI-ANNUAL REPORT FOR INDUSTRIAL USERS REGULATED BY 40CFR442

Use of this form is not an EPA/ADEQ requirement. Attn: Water Div/NPDES Pretreatment

## (1) IDENTIFYING INFORMATION

<p>A. LEGAL NAME &amp; MAILING ADDRESS</p> <p>PJ's Tank Wash, DBA Sherman Bros, Trucking Po box 706 Harrisburg OR. 97466</p>	<p>B. FACILITY &amp; LOCATION ADDRESS</p> <p>PJ's Tank Wash 2201 Hwy 82 West Crossett AR. 71635</p>
<p>C. FACILITY CONTACT: Bryan Hudson      TELEPHONE NUMBER: 870-364-7020      Email: BryanH@sbht.com</p>	

## (2) REPORTING PERIOD--FISCAL YEAR From April 1<sup>st</sup> to March 31<sup>st</sup> (Both Semi-Annual Reports must cover Fiscal Year)

<p>A. MONTHS WHICH REPORTS ARE DUE</p> <p style="text-align: center;">October &amp; April</p>	<p>B. PERIOD COVERED BY THIS REPORT</p> <p style="text-align: center;">FROM: April 1 2022 TO: September 31 2022</p>
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## (3) DESCRIPTION OF OPERATION

<p>A. REGULATED PROCESSES</p> <p><u>Subparts</u></p> <p>CHECK EACH APPLICABLE BLOCK</p> <p><input checked="" type="checkbox"/> Tank Trucks/Chemical &amp; Petroleum Cargo</p> <p><input type="checkbox"/> Rail Tank Cars/Chemical &amp; Petroleum Cargo</p> <p><input type="checkbox"/> Barges &amp; Ocean/Sea Tankers/Chem &amp; Petro Cargo</p> <p><input type="checkbox"/> Tanks/Food Grade Cargos</p> <p>Comments:</p> <p style="margin-left: 20px;">Tanker Trailers/Chemical</p> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>	<p>B. CHANGES:      SUMMARIZE ANY CHANGES IN THE REGULATED PROCESSES SINCE THE LAST REPORT. ATTACH AN ADDITIONAL SHEET IF THE SPACE BELOW IS INADEQUATE. PROVIDE A NEW SCHEMATIC IF APPROPRIATE.</p> <p>PJ's Tank Wash has discharged into the City of Crossett POTW between April 1 2022 and September 31 2022 a continuous flow from effluent holding. Test results are given to City engineer as well as the City pulls separate periodic tests to insure limits are met.</p>
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C. Number of Regular Employees at this Facility	D. [Reserved]
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**(4) FLOW MEASUREMENT**

INDIVIDUAL & TOTAL PROCESS FLOWS DISCHARGED TO POTW IN GALLONS PER DAY

Process	Average	Maximum	Type of Discharge
Regulated	2715		Continuous
§403.6(e) Unregulated*			
§403.6(e) Dilute			
Cooling Water			
Sanitary			
Total Flow to POTW	2715		Continuous

\*"Unregulated" has a precise legal meaning; see 40CFR403.6(e).

**(5) MEASUREMENT OF POLLUTANTS**

**A. TYPE OF TREATMENT SYSTEM**

CHECK EACH APPLICABLE BLOCK

- Neutralization
  - Chemical Precipitation and Sedimentation
- DAF
- Filtration
- Other \_\_\_\_\_
- None

**B. COMMENTS ON TREATMENT SYSTEM**

C. THE INDUSTRIAL USER MUST PERFORM SAMPLING AND ANALYSIS OF THE EFFLUENT FROM ALL REGULATED PROCESSES--CORE & ANCILLARY--(AFTER TREATMENT, IF APPLICABLE). ATTACH THE LAB ANALYSIS WHICH SHOWS A MAXIMUM; TABULATE ALL THE ANALYTICAL DATA COLLECTED DURING THE REPORT PERIOD IN THE SPACE PROVIDED BELOW. ZERO CONCENTRATIONS ARE NOT ACCEPTABLE; LIST THE DETECTION LIMIT IF CONCENTRATION WAS BELOW DETECTION LIMIT.

Pollutant(mg/l)	Cu	Hg	O&G (SGT-HEM Method)
Max for 1 day	0.84	0.0031	<5.0
Max Measured	0.031	N/D	<5.0

Sample Location \_PJ's Tank Wash Crossett Ar. 71635

Sample Type (Grab or Composite)Grab

Number of Samples and Frequency Collected 2 times, Every 3 months

40CFR136 Preservation and Analytical Methods Use:  Yes  No

(6) POLLUTION PREVENTION ACT OF 1990 [42 U.S.C. 13101 et seq.]

*16602 [42 U.S.C. 13101] Findings and Policy para (b) Policy.--The Congress hereby declares it to be the national policy of the United States that pollution should be prevented or reduced at the source whenever feasible; pollution that cannot be prevented should be recycled in an environmentally safe manner, whenever feasible; pollution that cannot be prevented or recycled should be treated in an environmentally safe manner whenever feasible; and disposal or other release into the environment should be employed only as a last resort and should be conducted in an environmentally safe manner.*

The User may list any new or ongoing Pollution Prevention practices including Best or Environmental Management Practices, Source Reduction, Waste Minimization, Lean Manufacturing, Water and/or Energy Conservaton:

**All water used in the tank wash operation is contained and recycled or returned to the city sewer system. We have a residual Product Management Plan, which includes RCRA/DOT class room testing and certification in accordance with 40 CFR part 264.16 and 49 CFR part 172.704. this training includes carefully segregating heels for determining proper disposal.**

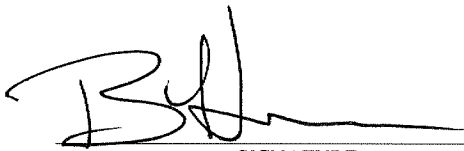
(7) GENERAL COMMENTS

(8) SIGNATORY REQUIREMENTS [40CFR403.12(I)]

**40CFR442 SEMI-ANNUAL REPORT CON'D FACILITY NAME:**

I certify under penalty of law that I have personally examined and am familiar with the information in this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Bryan Hudson  
NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE

  
SIGNATURE

Tank Wash Manager  
OFFICIAL TITLE

11-3-2022  
DATE SIGNED